

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE : CHAPTER 13
ALEATHA JESSIE : CASE NO: 16-10131ELF
Debtor :
: _____

**CERTIFICATION OF NO RESPONSE TO DEBTOR'S MOTION TO ENTER
DISCHARGE AND MOTION TO DECLARE AVOIDANCE OF LIEN**

The Debtor, through counsel, hereby avers:

1. On May 15, 2020, Debtor filed the above-captioned motions (the "Motions"). Doc. Nos. 48, 50.
2. On May 15, 2020, the Motions and Notices of Motion was served as stated in the Motions.
3. Pursuant to Local Bankruptcy Rule 9014-3, any response to the Motion was due no later than May 29, 2020.
4. As of this date, no response has been filed to the Motions.

WHEREFORE, Debtor prays that the Court enter an order granting the relief requested in the Motion.

/s/ Alfonso Madrid
ALFONSO MADRID, ESQ.
Attorney for Debtor
Community Legal Services of Philadelphia
Philadelphia PA 19140
(215) 227-4795
Amadrid@clsphila.org